

### **REMARKS**

Claims 1, 2, 4-8 and 10-15 are now pending in the application. The Examiner is respectfully requested to reconsider and withdraw the rejection(s) in view of the amendments and remarks contained herein.

### **REJECTION UNDER 35 U.S.C. § 112**

Claims 2, 3, and 4 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point and distinctly claim the subject matter which Applicant regards as the invention. This rejection is respectfully traversed.

Claim 2 is rejected because "the same material" lacks antecedent basis. Claim 2 is amended to provide antecedent basis for this phrase.

Claim 3 is cancelled. The rejection of claim 3, therefore, is moot.

Claim 4 is rejected because "the end of the conductive film" lacks antecedent basis. Claim 4 is amended to provide antecedent basis for this phrase.

Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

### **REJECTION UNDER 35 U.S.C. § 102/103**

Claims 1-8 stand rejected under 35 U.S.C. § 102(b) as being anticipated by, or in the alternative, obvious in view of Schnur et al (U.S. Pat. No. 5,079,600). This rejection is respectfully traversed.

The claimed invention recites a first conductive wiring is disposed in a wiring pattern area, and a second wiring pattern is disposed outside the wiring pattern area.

Schnur is silent with respect to a wiring pattern area, and to a conductive wiring disposed outside the conductive pattern area. At best, Schnur merely teaches “selectively” depositing conductive patterns on a substrate.

To anticipate a claim the claimed subject matter must be disclosed in the reference with sufficient specificity to constitute anticipation under the statute. “Selectively” depositing conductive patterns does not disclose a limitation where “a second conductive film [is] formed outside the wiring pattern area on the plate by the liquid drop discharge so as to be electrically separated from the first conductive film,” as claimed. There is also no disclosure or figure in Schnur, however, that would lead one skilled in the art to determine that “selectively” depositing conductive patterns on a substrate is equivalent to forming a first conductive wiring in a wiring pattern area and a second conductive pattern outside the wiring pattern area. Because Schnur’s teaching of “selectively” depositing conductive patterns is so broad, Applicant respectfully asserts that the teachings of Schnur are not sufficiently specific to constitute anticipation. Applicant respectfully asserts, therefore, that the claims are not anticipated.

There is also no teaching or suggestion that may be gleaned from “selectively” depositing conductive patterns on a substrate that would render the claims obvious. More particularly, as stated above, Schnur broadly teaches “selectively” depositing conductive patterns on a substrate. There is no teaching or suggestion, however, of a first conductive film wiring disposed on a wiring pattern area on a plate by liquid drop discharge, nor a second conductive film formed outside the wiring pattern area on the plate by the liquid drop discharge so as to be electrically separated from the first conductive film, as claimed.

At best, the Examiner has arbitrarily determined that the “selective” deposition of metal on a substrate taught by Schnur would lead one skilled in the art to arrive at the claimed invention. Applicant respectfully asserts, however, that “[t]o support the conclusion that the claimed invention is directed to obvious subject matter, either the references must expressly or impliedly suggest the claimed invention or the examiner must present a convincing line of reasoning as to why the artisan would have found the claimed invention to have been obvious in light of the teachings of the references.” *Ex parte Clapp*, 227 USPQ 972, 973 (Bd. Pat. App. & Inter. 1985). Schnur’s teaching of “selectively” depositing a metal film on a substrate neither expressly nor impliedly suggests the claimed device. There is no express or implied suggestion because the “selective” deposition of a conductive film is so broad, one skilled in the art would not be able to determine from the teachings of Schnur what the term “selective” actually means. Because this term is so broad, Applicant respectfully asserts that the Examiner is engaging in hindsight reconstruction of the claimed invention.

Lastly, Claim 1 recites that the first and second conductive wirings are deposited by liquid drop discharge. Schnur is completely silent with respect to such a technique. In fact, applicant respectfully asserts that the Office Action completely ignores this limitation of the claim. Because Schnur does not teach or suggest this limitation, applicant respectfully asserts that Claim 1 and each corresponding dependent claim are neither anticipated nor obvious in view of Schnur.

Accordingly, reconsideration and withdrawal of this rejection are respectively requested.

### New Claims

New Claims 10 through 15 are added. These claims are supported throughout the Specification and Drawings as originally filed. No new matter is added. Specifically, this subject matter is found in paragraphs [0086] and [0102]. Favorable consideration of these new claims is respectfully requested.

### CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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